

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE ANDY WARHOL FOUNDATION FOR THE VISUAL
ARTS, INC.,

Plaintiff,

-against-

LYNN GOLDSMITH AND LYNN GOLDSMITH, LTD.,

Defendants.

LYNN GOLDSMITH,

Counterclaim Plaintiff,

-against-

THE ANDY WARHOL FOUNDATION FOR THE VISUAL
ARTS, INC.,

Counterclaim Defendant.

No. 17-cv-02532-JGK

EXPERT REPORT OF DR. THOMAS CROW

TABLE OF CONTENTS

	<u>Page</u>
I. RETENTION	1
II. QUALIFICATIONS	1
III. MATERIALS REVIEWED	2
IV. COMPENSATION	2
V. STATEMENT OF OPINIONS REGARDING ANDY WARHOL’S CELEBRITY PORTRAITS	3
A. Scholarship On Andy Warhol’s Celebrity Portraits.....	3
B. Andy Warhol’s Process Of Making Celebrity Portraits	9
VI. STATEMENT OF OPINIONS REGARDING ANDY WARHOL’S <i>PRINCE</i> SERIES	12
A. The Development of Andy Warhol’s 1980s Social Milieu	12
B. Andy Warhol’s <i>Prince</i> Portraits.....	15
C. Andy Warhol’s <i>Prince</i> Portraits Versus Lynn Goldsmith’s Photograph.....	18
VII. CONCLUSION.....	21

EXHIBITS

Exhibit A: Resume of Dr. Thomas Crow.....(4 pages)

Exhibit B: List of Materials Reviewed and Relied Upon(8 pages)

I. RETENTION

I have been retained by Quinn Emanuel Urquhart & Sullivan, LLP on behalf of The Andy Warhol Foundation For The Visual Arts, Inc. to offer my objective, expert opinion on Andy Warhol's 1984 portraits of the musician Prince (Prince Rogers Nelson). Specifically, I was asked to offer my expert opinion about the following topics:

1. The history, composition, and message of Andy Warhol's celebrity portraits.
2. The history, composition, and message of Andy Warhol's portrait of the music artist Prince.

I offer this report as a deeply experienced and widely recognized expert on the art and career of Andy Warhol. Its purpose is to review the best historical and interpretive literature on the artist and offer an opinion about whether Warhol's portraits of Prince effected a significant transformation of the photograph on which they were based. I opine that Warhol did significantly transform the photograph of Prince, both in composition and meaning, and that the significant character and artistic value of Warhol's Prince portraits as works of art—as is the case in all of his celebrity portraits—inheres in the extent and character of that transformation.

II. QUALIFICATIONS

Following is a summary of my art-related resume and *curriculum vitae* (attached as Exhibit A):

Education

University of California, Los Angeles: Ph.D. (1978); M.A. (1975)
Pomona College, B.A. (1969) *Magna Cum Laude*, Phi Beta Kappa

Honors

Paul Mellon Lecturer in British Art, National Gallery, London and Yale Center for British Art, 2017
Honorary Doctorate, University of London, 2016
A. W. Mellon Lecturer in the Fine Arts, National Gallery of Art, 2015
J.S. Guggenheim Fellow, 2014-15
Holly Fellow, Clark Art Institute, 2014

Honorary Doctorate, Pomona College, 2006
Member, American Academy of Arts and Sciences, since 2001

Professional Leadership Positions

Institute of Fine Arts, New York University, Rosalie Solow Professor of Modern Art
Associate Provost for the Arts, New York University, 2007–2011
Getty Research Institute, Director, 2000–2007
Yale University: Robert Lehman Professor of History of Art, 1996–2000; Chair,
Department of Art History, 1997–2000
University of Sussex, Professor and Chair, History of Art, 1990–1996

Representative Writings and Lectures

Restoration: The Fall of Napoleon in the Course of European Art (Princeton University Press, forthcoming October 2018)
No Idols: The Missing Theology of Art (University of Sydney and University of Washington Presses, 2017)
The Long March of Pop: Art, Design, and Music 1930-1995 (Yale University Press, 2015)
Emulation: David, Drouais, and Girodet in the Art of Revolutionary France (Yale University Press, 2006)
Gordon Matta-Clark, co-author (London: Phaidon Press, 2003)
The Intelligence of Art (University of North Carolina Press, 1999).
The Rise of the Sixties: American and European Art in the Era of Dissent (New York: Prentice-Hall, 1996)
Modern Art in the Common Culture (Yale University Press, 1996)
Painters and Public Life in Eighteenth-Century Paris (Yale University Press, 1985)

Teaching Experience

University of Chicago
Princeton University
University of Michigan
Sussex University (UK)
Yale University
University of Southern California
New York University

III. MATERIALS REVIEWED

I have attached as Exhibit B a list of the documents I reviewed and relied upon in connection with the preparation of this report.

IV. COMPENSATION

Written expert work	\$400 per hour
Testimony in depositions and at trial	\$500 per hour, with a minimum of \$4,000 per day of testimony

V. STATEMENT OF OPINIONS REGARDING ANDY WARHOL’S CELEBRITY PORTRAITS

A. Scholarship On Andy Warhol’s Celebrity Portraits

Warhol’s 1984 portraits of the musician Prince effected a significant transformation of the photograph on which they were based. Indeed the significant character and artistic value of Warhol’s Prince portraits as works of art—as is the case in all of his celebrity portraits—inheres in the extent and character of that transformation. This section of my report addresses this concept as it applies to Warhol’s celebrity portraits generally, as a prelude to addressing these issues as applied to Warhol’s portraits of Prince.

My opinion about Warhol’s celebrity portraits lies at the foundation of the considerable body of scholarly and critical writing on the artist that has emerged since his death in 1987, which is summarized in a 2016 anthology, *On & By Andy Warhol*, published by the MIT Press in the United States and the Whitechapel Gallery (one of the major public venues for modern and contemporary art) in London. Its editor, Gilda Williams, addresses this issue in her introduction [14]:

The artist’s unexpected death early in 1987 momentarily stunned the art world into a kind of mute paralysis.... [A]n unprepared art community was suddenly faced with the monumental task of sifting through his legacy, still uncertain of its ultimate worth. Thomas Crow’s groundbreaking ‘Saturday Disasters: Trace and Reference in Early Andy Warhol’ (1987) opened the suspicion that Warhol’s performance of passivity during his lifetime disguised the devastating control he had wielded over the response to his art.¹

Warhol had exerted that control via the consistency with which he maintained his public persona, limiting his remarks about his art to vapid pronouncements that he wanted to be like a

¹ Gilda Williams ed., *On&By Andy Warhol* (London and Cambridge, MA: Whitechapel Galley and MIT Press, 2016); “Saturday Disasters: Trace and Reference in Early Andy Warhol,” originally published in *Art in America* (May 1987), 129–136.

machine or that he and his art were all surface. Williams continues to say that, on the publication of my 1987 essay, “[s]uddenly, decades of (almost) unquestioned belief in Warhol’s ‘Pop’ self description—that his hollow persona adhered to his equally depthless art—was called into doubt, and began to be dismantled.”

“Saturday Disasters” has been anthologized in four further publications,² with a substantial excerpt in the 2016 volume edited by Williams [135-143]. In this way, its argument has remained a primary point of reference in serious Warhol studies to date. I have continued in the intervening years to write and lecture about Warhol’s work, supervising student research on the subject, while incorporating further discussions of his art into two books that have become widely used in the teaching of art history: *The Rise of the Sixties: American and European Art in the Era of Dissent* (1996, revised edition, Yale University Press, 2005) was praised in *Publishers Weekly* as “invaluable for both students of art and any reader interested in this most significantly subversive decade in contemporary culture,” and *The Long March of Pop: Art, Music, and Design 1930-1995* (Yale University Press, 2014) contains two chapters devoted to Warhol in its 400-plus pages. The reviewer in the *College Art Journal*, published by the American professional association of art historians, wrote that “this dazzlingly comprehensive, elaborately constellated new history of Pop ... lays down a gauntlet for future scholarship, not only on 1960s art, but on art’s relationship to vernacular culture more generally.”³

² Serge Guilbaut ed., *Reconstructing Modernism: Art in New York, Paris, and Montreal 1945-1964* (Cambridge MA and London: MIT Press, 1992); Thomas Crow, *Modern Art in the Common Culture* (New Haven and London: Yale University Press, 1996), 49–65; Annette Michelson ed., *October Files 2: Andy Warhol* (Cambridge MA and London: MIT Press, 2001), 49–68, from which further page citations are taken; and in French translation in *Les Cahiers du Musée National de l’Art Moderne*.

³ Johann Gosse, “Subterranean Homegrown Blues.” Review of Thomas Crow, *The Long March of Pop: Art, Music and Design, 1930-1995* (New Haven: Yale University Press, 2014), *Art Journal* (Fall 2016), 70–73.

By “vernacular,” this reviewer means the sort of material that Warhol found in the magazine, publicity, and newspaper photographs, which served as the primary sources for his art in general and his celebrity portraiture in particular. One passage in *The Long March of Pop* particularly germane to the present question reads, “the flat, emblematic character of ... each actual film star likeness, product label, or newspaper photograph transferred to canvas ... drains from them most of the semblance of life, even that portion retained in the photographic surrogates that provided Warhol with his templates. His consistent manner of transforming these sources makes them resemble one another more than they resemble any particular person or thing in the world.” [287.] The point of this observation is that any photographic likeness deployed by Warhol assumed a place within a recognizably Warholian universe of symbols, one that possessed its own order, recognizable character, and internal codes of meaning—entirely distinct from such elements, if any, that might be found in the photograph itself.

Defining the character of that universe has been a cumulative effort by many art historians and critical interpreters, some contributions preceding my own initial Warhol intervention in 1987, and that progression of thought merits a summary here. Michael Fried, of Johns Hopkins University, one of the most distinguished American critics and art historians, wrote a review in 1962 of one of Warhol’s earliest fine-art exhibitions, which included some of his first paintings of Marilyn Monroe. Fried was one of the most prominent partisans of thoroughly abstract art and thus indifferent if not hostile to painting with recognizable subject matter, which included the work of emerging Pop artists. Nonetheless Fried found himself moved by what he saw and compelled to say so: “At his strongest—and I take this to be in the Monroe paintings—Warhol has a painterly competence, a sure instinct for vulgarity (as in his choice of colors) and a feeling for what is truly

human and pathetic in one of the exemplary myths of our time.”⁴ Fried’s terms of praise are intentionally paradoxical; ascription of vulgarity might seem to strike a discordant note, but points to Warhol approaching the universality of myth via the broadest range of human sympathies.

Heightened awareness of complexity in the creation of Warhol’s signature celebrity portraits of the 1960s went hand in hand with finding in them more profound meanings. The catalogue for the large, unprecedented retrospective exhibition of Warhol’s work mounted in 1989 by the Museum of Modern Art in New York also included a groundbreaking essay by the art historian Benjamin H.D. Buchloh, then on the faculty of M.I.T. and now at Harvard, which newly recognized in Warhol’s art strong conceptual affinities with other, celebrated examples of avant-garde art. Buchloh saw the artist as having exposed the deficiencies of the larger culture in which such superficial icons loom so large: “Although Warhol constructed images of Marilyn Monroe, Liz Taylor, and Elvis Presley in the tragicomical conditions of their glamour, the paintings’ lasting fascination does not derive from the continuing myth of these figures but from the fact that Warhol constructed their image from the perspective of the tragic condition of those who consume the stars’ images....”⁵

In his *New York Times* review of the 1989 retrospective exhibition, critic Michael Brenson made an equal and opposite argument to Buchloh’s sense of tragic entrapment in mediated images, echoing the eminent art historian Robert Rosenblum in seeing rather a paradoxical purity and even metaphysical import: “His flat images, painted in a flat tone, existing in a non-space from which past and future have been banished ... make the present seem absolute and eternal—in other words,

⁴ Michael Fried, “New York Letter,” review of Andy Warhol at the Stable Gallery, *Art International* (December 1962), 57.

⁵ Benjamin H.D. Buchloh, “Andy Warhol’s One-Dimensional Art,” in McShine ed., *Andy Warhol: A Retrospective*, 53.

transcendent. Part of Warhol's achievement was to legitimize his love of secular, profane subjects by attaching to them traditional religious values. ... Warhol argues that self-effacement and sensual excess, purity and trash, the moment and eternity can exist together.”⁶

Whether disabusing or other-worldly, the deeper qualities that many have noted in the Marilyn images among others can only have been the outcome of Warhol's interventions; they resonate as strongly as they do because they arrive with such surprisingly emotive effect. Feelings are involuntary in nature, and they are often prompted by the elusive traces of memory. I observed in my 1987 essay that the “screened image, reproduced whole, has the character of an involuntary imprint. It is memorial in the sense of resembling memory: powerfully selective, sometimes elusive, sometimes vividly present, always open to embellishment as well as loss.”

For his monumental *Marilyn Diptych* of 1962, Warhol arrayed no less than fifty repetitions of his screened module, twenty-five to each of the work's joined panels, colored on the left, black and white on the right. He thus put into play, as I wrote [52-3], “a stark and unresolved dialectic of presence and absence, of life and death. The left side is a monument; color and life are restored, but as a secondary and invariant mask added to something far more fugitive. Against the quasi-official regularity and uniformity of the left panel, the right concedes the absence of its subject, displaying openly the elusive and uninformative trace underneath. ... [S]he is most real and best remembered in the flickering passage of film exposures, no one of which is ever wholly present to perception. The heavy inking in one vertical register underscores this: the passage from life to death reverses itself; she is most present where her image is least permanent. In this way, the *Diptych* stands as a comment on and complication of the embalmed quality and slightly repellant stasis of the *Gold Marilyn*.”

⁶ Michael Brenson, “Review/Art: Looking Back at Warhol, Stars, Super-Heroes and All.” *New York Times* (3 February 1989).

On the occasion of Warhol's next major retrospective, the internationally traveling exhibition organized by the German curator Heiner Bastian in 2002, the preceding views found affirmation and forms of synthesis in Bastian's introductory essay. The celebrity portraits of the 1960s, he argued, "imply emptiness, the distant past, and the after life but also the antinomy between saintly relic and fallen woman—articulate the 'high and the utterly base' that are always simultaneously perceptible in Warhol's work.... In the Liz [Taylor] and Marilyn portraits, and in the Elvis silkscreens, the aura of utterly affirmative idolization already stands as a stereotype of a 'consumer-goods style' expression of an American way of life and of the mass-media culture of a nation.... In these works the hyper-icons of Pop turn into icons of demonic emptiness: Warhol's notions of 'beauty' cannot be imagined without tragedy."⁷

By this juncture, the consensus among specialists was that the first phase of Warhol's celebrity portraiture—that preceding a turn towards film in the late 1960s and his grievous wounding in the assassination attempt of 1968—is best understood within such a range of meanings. Following his prolonged recovery, however, his approach to portraiture changed in several important respects. Some changes followed from the fact that his own fame and social standing had risen to the point that he frequently dealt with his celebrity subjects as a peer and close acquaintance rather than as a remote observer from a fan's subculture. Portraits were most frequently bespoke commissions rather than independently conceived works of art, solicited as a planned stream of revenue to support the considerable scope of his studio infrastructure ("the Factory").

In the view of Rosenblum, this change did not in any way preclude significant artistic achievement: "Take the pair of Liza Minnelli portraits," he wrote of a 1978 commission from the

⁷ Heiner Bastian, "Introduction," *Andy Warhol Retrospective* (Los Angeles: Museum of Contemporary Art, 2002), 27–28.

entertainer in whose circle Warhol moved, “[w]hat we may first see is how a familiar face is flattened to extinction by the blinding glare of a flashbulb or by the cosmetic mask of lip gloss, hair lacquer, mascara. Almost like Manet in *Olympia* [1863-65], Warhol has here retouched reality to push his pictorial facts to a two-dimensional extreme. Middle values vanish (the nose and shoulders are swiftly ironed out to the flatness of paint and canvas), and we are left with ... this insistent material façade of opaque, unshadowed paint... From behind this brash silhouette, a pair of all too human almost tearful eyes returns our gaze....”⁸

B. Andy Warhol’s Process Of Making Celebrity Portraits

Art historian Rainer Crone published the first serious scholarly account of Warhol’s art in 1970, adapting it from his German doctoral dissertation. Crone’s argument for Warhol’s achievement rested on the leap from commonplace subject matter to the prestige inherent in painting as an artistic medium. He posited that the act of transferring a popular photographic image to a painting, that is, to a unique stretched canvas meant to be contemplated in a gallery, introduced a “revolutionary” new meaning into the practice of art: “Warhol’s reproduction technique is perhaps shown most clearly in the Marlon Brando painting of 1966. It consists of an image taken from a poster of Brando (available for \$1.00 in any poster shop) and silkscreened on unprimed canvas. In combining a poster meant for mass circulation and a painting, traditionally intended for contemplation by an educated individual—its very existence becomes its sole justification ... he transforms the easel painting into a carrier of ideas....”⁹

Crone was not just arguing that the everyday source from a Brando poster was lent new value by its transposition to a Warhol painting; he went further to say that the art of painting had

⁸ Robert Rosenblum “Andy Warhol: Court Painter to the 70s,” in David Whitney ed., *Andy Warhol: Portraits of the Seventies* (New York Random House, 1979) 205–216.

⁹ Rainer Crone, *Andy Warhol: A Catalogue Raisonné* (New York: Praeger, 1970), 10.

likewise been transformed by its now being able to convey ideas about contemporary conditions of life, a capability that had heretofore been beyond its capabilities. Rosenblum made the point more explicitly in 1979, from the same 1979 critical text quoted above: “By accepting the photograph directly into the domain of pictorial art, ... Warhol was able to grasp instantly a whole new visual and moral network of modern life that tells us not only the way we can switch back and forth from artificial color to artificial black-and-white on our TV sets but also the way we could switch just as quickly from a movie commercial to footage of the Vietnam War. For Warhol, the journalistic medium of photography, already a counterfeit experience of the world out there, is double counterfeit in its translation to the realm of art.”¹⁰

Rosenblum was personally close to Warhol and spoke with a greater degree of first-hand knowledge than did most of his peers. The artist’s regular Catholic religious observance informed Rosenblum’s observation about the 1962 *Gold Marilyn* in the collection of the Museum of Modern Art: “When Warhol took a photographic silkscreen of Marilyn Monroe’s head, set it on gold paint, and let it float high in a timeless, spaceless heaven..., he was creating, in effect, a secular saint for the 1960s that might well command as much earthly awe and veneration as, say, a Byzantine Madonna hovering for eternity on a gold mosaic ground.”

Rosenblum’s observation, much as Fried’s observation had done in 1962, confirms that Warhol’s painting can carry an emotional charge that was not necessarily—and sometimes could not have been—present in the photographic source. The Marilyn Monroe series offers a clear case in point. As Warhol began the series within weeks of the actress’s suicide, the fans’ feelings of loss and mourning motivated his choice of that particular motif at that moment in time. He began by purchasing a publicity still of Monroe from the 1953 film *Niagara*. His translation of the

¹⁰ Rosenblum “Andy Warhol: Court Painter to the 70s,” *supra* n. 8.

heavily cropped photograph into a silkscreen pattern entailed a drastic simplification of the original, a discretionary reduction of tonal gradations to a high-contrast pattern that functioned more like a heraldic emblem than any sort of rounded, particularized representation.

Emerging awareness of the complexities engendered by Warhol's image-manipulations became apparent in the 1989 MoMA catalogue. That catalogue included the most complete discussion of Warhol's techniques up to that date, provided by the British curator and author Marco Livingstone under the title, "Do It Yourself: Notes on Warhol's Technique." His lengthy description of how the Marilyn Monroe images were created [72] defies any shorter summary:

A pencil tracing was taken from the full sized [transparent] acetate prepared for the photographic screen. Either by transferring the penciled line by pressing onto the front of the acetate or sheet of paper, or by placing a sheet of carbon paper beneath the tracing and then drawing the line one section at a time, a rough guide was established for each color area, for example, the lips and the eyelids. The colors were then brushed on by hand, often with the use of masking tape to create a clean junction between them, with the eventual imposition of the black screened image also serving to obscure any unevenness in the line. The acetates were examined by Warhol before they were made into screens, so that he could indicate by means of instructions, written and drawn with china-marking crayon, any changes to be made: for example, to increase the tonal contrast by removing areas of half-tone, thereby flattening the image. The position of the image would be established by taping the four corners of the acetate to the canvas and then tearing off the tape along the corner edges of the acetate; the fragments of tape remaining on the canvas would serve as a guide in locating the screen on top. The position of the screen would be confirmed by eye, and it would then be printed.¹¹

A Warhol painting is thus far from any unreflective replica of a photographic source, but rather the outcome of a complicated, highly considered interplay of disparate elements. Variables in execution were as significant as the plan; that is to say, just how much looseness to introduce into the procedure was crucial to its outcome, no simple matter of working fast or carelessly, but

¹¹ Marco Livingstone, "Do It Yourself: Notes on Warhol's Technique," in Kynaston McShine ed., *Andy Warhol: A Retrospective* (New York: Museum of Modern Art, 1989), 72.

one of subtle understanding on Warhol's part that too much precision would rob his images of the unexpected liveliness and frequent pathos that has kept them relevant and compelling over the decades.

VI. STATEMENT OF OPINIONS REGARDING ANDY WARHOL'S *PRINCE* SERIES

A. The Development of Andy Warhol's 1980s Social Milieu

Warhol's 1984 portrait series of sixteen portraits devoted to the musician and actor Prince partook to a degree in the technical approach that he had developed for his commissioned portraiture, but it also harked back to the independently conceived celebrity likenesses of his earlier career. As Prince had not commissioned any of the paintings, Warhol could experiment with far more variations in background patterns and colors, including uninflected pale gray paint or white paper, all of which would have diluted the value of a private portrait. His evident fascination with the young African-American entertainer, known for sexual frankness in his music and an androgynous style in his clothes, make-up, and hairstyle, echoed similar traits among those he famously gathered around himself in the Factory entourage of the 1960s.

In the 1960s, though he was well into his thirties, Warhol had become one of the dominant style setters in youth culture, beginning in the downtown Manhattan scene and, as time has gone on, all over the world. He cultivated two youthful companions in particular: (1) the gay, model-handsome poet Gerard Malanga, who also became an adept assistant to Warhol in the studio, and (2) the heiress Edie Sedgwick, who actually modeled for *Vogue* and was for a time his regular companion at openings and parties. Despite the fifteen-year difference in their ages, Warhol and Sedgwick both affected silver hair and similar clothes, such that they were perceived as inseparable quasi-twins.

Malanga and Sedgwick did not serve as subjects for paintings, but they were prominent actors in the films that consumed a growing amount of Warhol's time and attention from 1963 onwards. As Warhol enlarged his repertoire of painted subjects in the first half of the 1960s, its key personages, rendered as mask-like emblems, came to function as projected aspects of Warhol's own inner self. As his Factory entourage swelled, he used its cast of variously beautiful, colorful, and eccentric personalities to a similar purpose. It was recognized that Warhol, outwardly reticent and undemonstrative, used such charismatic companions as surrogates, aspects, or projections of his conflicted inner psychology. He drew in Lou Reed, leader of the rock band The Velvet Underground, and was credited as producer for their first, enormously influential album released in March 1967. While more a cult than commercial success, *The Velvet Underground and Nico* served as a convincing riposte to Bob Dylan, chief avatar of the coming rock-music boom and then Warhol's great rival for preeminent esteem in the underground culture of lower Manhattan (see Crow, *The Long March of Pop*, 271–312). In short, Warhol worked very hard to present himself positively to the emerging youth culture of the 1960s, and he cultivated relationships with impressive, much younger figures who carried authority there.

By the early 1980s, his cutting-edge reputation had taken a beating, as commercial enterprises like *Interview* magazine (and many of the portraits) positioned him much closer to Studio 54 and the Reagan-era establishment than to any youth vanguard. It was true that the “appropriation” art by young artists (e.g., Jeff Koons, Haim Steinbach, Cindy Sherman), appearing in storefront galleries or non-profit spaces, owed an immense debt to Warhol's foundational example, while clubs on the Bowery or around Tribeca were launching musicians (e.g., Patti Smith, Ramones, Talking Heads) equally indebted to the example of the Velvet Underground. But Warhol had lost his direct connection to the current cultural moment, lacking equivalents to the

estranged Malanga or Sedgwick, deceased since 1971, who would in any event have aged out of their former roles.

Warhol could only have been aware, too, that the nature of the New York underground had markedly shifted since his first 1960s heyday. Younger artists and musicians of the early 1980s were sharing space in their downtown haunts with representatives of Latino and African-American communities, carried by the first wave of rap and hip-hop music and the graffiti art migrating from the nocturnal train yards to SoHo gallery exhibitions. The young Jean-Michel Basquiat, of mixed Haitian-American and Puerto Rican parentage, embodied this change in his person and artistic enterprise. He first made his name as one of a two-man graffiti partnership under the name of SAMO, which distinguished itself by tagging walls in the then-central art gallery district of SoHo. He made himself visible in the right clubs and other gathering places, displaying a special fascination for Warhol. Having begun his transition to fine art by painting small compositions on postcards, he always carried a selection with him. Spotting Warhol at lunch with David Bowie and the curator Henry Geldzahler, he dashed into the restaurant to sell Warhol some of his work.

When the two were properly introduced late in 1982 by the Swiss dealer Bruno Bischofberger, a power in the art market, they embarked on a friendship that would last, with inevitable ups and downs, until Warhol's death in 1987. They exchanged portraits after their initial meeting, and not long after began working together in Warhol's Factory studio space. Warhol is said to have offered help with Basquiat's growing drug dependency, which aggravated his already erratic behavior. Only intermittently successful in that endeavor, the older artist for his part appeared to gain renewed energy and commitment from their collaborations.

Outwardly, Warhol returned to the black jeans, leather jacket, and mirrored sunglasses of his 1960s persona, abandoning the Brooks Brothers suits that had accompanied his portrait

“business” phase.¹² The art historian Charles Stuckey has documented the degree to which Warhol in the 1980s was likewise returning to the themes of his much earlier work, going as far back as the early 1960s, but that recapitulation entailed a nearly exclusive concentration on advertising and cartoon imagery.¹³ The two artists would mount a show together in 1985, announced by a famous poster showing them as matched opponents in boxing gear.

B. Andy Warhol’s *Prince* Portraits

It required an external intervention early in 1984 to draw Warhol back into the mode of his early silkscreen portraits. *Time* magazine was preparing a cover feature on the singer Michael Jackson and commissioned Warhol to provide the image. Warhol wrote in a diary entry for March 7, 1984, five days before the cover date, that forty “*Time* people” came to the studio to look at the alternatives he had prepared, all based on a cheerfully smiling photograph. “And they stood around,” he noted, “saying that it should increase newsstand sales.”¹⁴ Their choice featured a sunny yellow background befitting Jackson’s emergence, with the release of the hugely best-selling *Thriller*, as an all-around entertainer embraced by a mass consumer audience.

The *Time* commission was publicly known when *Vanity Fair* asked Warhol to provide an image to accompany its profile of the young, African-American musician Prince, who had crossed over to film success with the release of *Purple Rain* and its accompanying album in 1984. As Warhol was known, more than any other artist, to have made fame his defining subject, his contribution made sense when juxtaposed to the punning headline, “Purple Fame.”¹⁵ Credited to

¹² Victor Bockris, *The Life and Death of Andy Warhol* (New York: Bantam, 1989), 331.

¹³ Charles Stuckey, *Andy Warhol: Heaven and Hell Are Just One Breath Way! Late Paintings and Related Works* (New York: Rizzoli and Gagosian Gallery, 1992), 9–33.

¹⁴ Warren Perry, “Michael Jackson and Andy Warhol: Destined to Meet,” National Portrait Gallery blog (9 October 2010), <http://npg.si.edu/blog/michael-jackson-and-andy-warhol-destined-meet>.

¹⁵ “Tristan Vox” [Leon Weiseltier], “Purple Fame: An Appreciation of Prince at the Height of His Powers,” *Vanity Fair* (November 1984), 66.

“Tristan Vox,” the accompanying essay in *Vanity Fair* was actually the work of Leon Wieseltier, who had just begun his renowned career as literary editor of the *New Republic*. The article marked the rise of its subject to a position of commanding celebrity: “escape from Prince,” Wieseltier declared, “is no longer possible. Finally he has arrived. The evidence is everywhere. The reasons are good. His music is some of the tightest and most tumid rock ‘n’ roll ever made. The movie *Purple Rain* is a crude minor classic. ... From Minneapolis, Minnesota, there comes another tough but tender, violent but vulnerable American hero.”

The Brando-Presley clichés come thick and fast in the last sentence, but serve accurately to recall, whether he read Wieseltier or not, Warhol’s early fascination with such prototypical male heroes. In that sense, Prince as a subject carried a deeper affinity with the disinterested choices of subjects from the artist’s early career, in contrast to the Jackson paintings, which adhere more to the manner of the bespoke portraiture from the 1970s and 1980s. What was more, the more cultish and edgy character of Prince’s parallel breakthrough in 1984 made him the obvious alternative to Jackson, one more in tune with the more discriminating dance/club crowd in New York.

In further contrast to Jackson, with whom Warhol had been personally acquainted since the Studio 54 period of the 1970s, Prince was a distant figure known to Warhol only via publicity images and his charismatic appearance on the cinema screen. In the constellation of Warhol’s early art, the aura of his Marilyn visages had come to settle on the face of Edie Sedgwick, as the undiminished charisma of the deceased film star found a living surrogate in the center of the imaginative universe shared by Warhol and his intimates. A parallel dynamic is not difficult to discern, if on a diminished scale, between the images of Prince and the immediate reality of Basquiat, joined to Warhol via shared labor and friendship, in Warhol’s re-engagement with the

youth culture that surrounded him, as Prince's scene was in distant Minneapolis conveyed only by inference from pictures, records, and film.

A photograph from 1981, when Prince had just broken through to widespread recognition with his 1980 *Dirty Mind* album, remained far from the celebrity that the 1999 album and *Purple Rain* had brought him by 1984. The fame that is Warhol's subject in the Prince portraits was thus of a different magnitude than Prince would have been experiencing three years before, as the Marilyn Monroe mourned and remembered in 1962 had been far from the ingénue captured by photographer Gene Kornman in 1953. In his transformation of the photographic portrait by Lynn Goldsmith, Warhol began with an extreme cropping that eliminated everything in the source but the face and hair. Taking away the high Edwardian collar entirely draws the lower part of the face down to a narrow point, on which the isolated head as a whole seems to balance itself. Warhol then went about draining the inner tone and texture out of what was left. The first stage of the silkscreen transfer, as noted above, was for the laboratory to send back the processed image on a sheet of transparent acetate, which would have been largely clear in the center. The heightened contrast that Warhol preferred has the effect of isolating and exaggerating only the darkest details: the hair, moustache, eyes, and brows. One conspicuous effect of these changes was to make the subject appear to face fully towards the front as a detachable mask, negating the more natural, angled position of the figure in the source photograph.

The Andy Warhol Museum in Pittsburgh holds, along with three other versions, the painting used for the original 1984 article in *Vanity Fair*. Without direct examination of this source, no full reckoning of Warhol's transformations is possible. I closely inspected these works in person at the Andy Warhol Museum. On close inspection, it is evident that Warhol prepared two separate silkscreens, which overlay one another on top of two hand-painted areas of color: the

nearly fluorescent red-orange ground and the facial area in purple. The first screen is the one derived from the cropped photograph and is inked in black. The greater part of this screen consists in the uninflected mass that represents the subject's hair. Indications of the facial features—eyes, brows, mouth, and moustache—extend from this mass in a smudged, approximate manner. The vibrancy and definition of these features largely derive from the second screen, which was created from Warhol's freehand lines drawn around and over the photographically derived layer beneath. He inked the second screen in different ways on each of the examples in the Warhol Museum collection, varying and blending the colors within a single application. In the painting used for the illustration accompanying the *Vanity Fair* article, the lines in and around the tendril of hair at the top are yellow, while the inscriptions over the facial features shift between orange, red, and pink. These lines represent Warhol's own free invention, by means of which he made a point of diverging from the given facts of the photographic impression to provide his portrayal of Prince with a confrontational presence and intensity absent in his source.

These cumulative changes also made the subject appear to face fully towards the front as a detachable mask, cancelling the more natural, angled position that Prince assumed for the Goldsmith photograph. This effect returned Warhol to the origins of his art-critical credibility, that is, the flattened, emblematic, minimally descriptive manner that had characterized his first, definitive phase as an artist.

C. Andy Warhol's *Prince* Portraits Versus Lynn Goldsmith's Photograph

I have viewed images of several of Lynn Goldsmith's photographs of Prince, including her photograph of Prince that is said to be the source of the "artist reference" Warhol viewed before creating his portraits of Prince. I also reviewed Lynn Goldsmith's deposition transcript. I focused carefully on her description of the creation, meaning, and message she associates with the photograph of Prince that Warhol used as a reference for his portraits. Goldsmith explained:

Q. What was the forefront of your mind [when making this photograph]?

A. Getting him to get comfortable, but he is what he is.

Q. And you were trying to capture who he was?

A. You try to do it all.

Q. And in that moment, his identity was revealed to you was -- how would you describe it?

A. Someone who could be so expressive and really was willing to bust through what must be their immense fears to make the work that they wanted to do, which kind of required a different part of themselves, but at the heart of it all, they're frightened.

Q. Do you think you conveyed that?

A. In the picture?

Q. In the picture.

A. It's in the picture, I don't even like looking at it.

Q. Why?

A. Because of that, it makes me really sad.

Q. So you connected with that when you were making these photographs?

A. Yes.

Q. Do you think we can see sort of your story and your empathy when looking at the photographs that captures that?

A. In some ways, I hope so, but in other ways, I really hope nobody does.¹⁶

She also explained:

Q. So there is an important element of the photography in the book that you are trying to humanize, both the subjects and yourself in what you are portraying, is that right?

A. I'm just trying to find out who I am and that journey only takes place by also trying to find out who other people are.

¹⁶ Lynn Goldsmith Deposition Transcript 105:8–106:15.

Q. There is a real effort to communicate to the uniqueness of the people and their identities in these photographs?

A. Right. Because they're all part of me, they are all part of all of us.

Q. And when you are connecting who you are with the identity of the people in your photographs, you are trying to do that as accurately as you possibly can, as it relates to their personality?

A. I don't know about accurate. I mean, that word, I'm trying to be as empathetic.¹⁷

Warhol's portraits of Prince are materially distinct in their meaning and message. Unlike Goldsmith's focus on the individual subjects' unique human identity, among other related topics, *see supra* n.17, Warhol's portraits of Prince, as with his celebrity portraits generally, sought to use the flattened, cropped, exotically colored, and unnatural depiction of Prince's disembodied head to communicate a message about the impact of celebrity and defining the contemporary conditions of life. This approach transforms the character, message, and historic and artistic value of Warhol's portrait of Prince compared to Goldsmith's photograph.

Warhol's portraits of Prince are also materially distinct from Goldsmith's photograph in their composition, presentation, color palette, and media. Goldsmith's photograph is a photograph of Prince's head and upper body in muted tones. Warhol's paintings are, as I describe above, composed and presented using materially distinct colors, form, cropping, and contrast. This

¹⁷ *Id.* 74:18–75:14; *see also id.* 7:23–8:2 (“Q. Do you agree that your photography has provided you an opportunity to make your passion of a quest into the nature of identity in the human spirit? A. Yes, I do.”), 62:11–20 (“Q. Do you think that your images reveal a great deal about your subjects, as is written here? A. Yes. Q. In what way? A. Each one is different. Q. But as we’ve talked about, you are trying to reveal something about each individual subject’s human identity? A. As best I can, yes”), 66:25–67:22 (“I put myself in the shoes of who is in front of the camera. I mean, I feel like I’m them, like when I talked about how I want the body to be comfortable, I just have this, you are me and I am you. Q. So when we were looking at the photo of Bruce Springsteen, for example, together just a little bit ago, you were attempting to capture his human identity as you talked about, but you are also trying to connect with him, so I’m experiencing what you, in fact, experienced in that very moment when you were connecting with him, is that accurate? A. I actually feel like I’m standing there. Q. So I’m seeing Bruce Springsteen and his identity and his story, but through your eyes, because you are in his shoes in that moment as you are taking or making that photograph? A. Yes.”).

distinct visual presentation between Warhol's art and Goldsmith's photograph contributes to the transformed meaning and message in Warhol's works compared to Goldsmith's photograph.

In sum, Warhol's portraits of Prince effected a significant transformation of the photograph on which they were based, consistent with the approach he applied to his other celebrity portraits.

VII. CONCLUSION

Andy Warhol's 1984 portrait of Prince is fundamentally distinct from Goldsmith's photograph of Prince. The composition, presentation, scale, color palette, meaning, and media are fundamentally different and new compared to Goldsmith's photograph, as is the expressive nature of Warhol's portrait of Prince. These conclusions, and my opinion in this report, rest on well-established literature about Warhol's art that are generally accepted in my field of art history and widely accepted in public commentary and public perception about Warhol's art.

A handwritten signature in blue ink that reads "Thomas Crow". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dr. Thomas Crow

EXHIBIT A
***Curriculum Vitae* of Thomas Crow**

Thomas Crow teaches art history at the Institute of Fine Arts, New York University where he is Rosalie Solow Professor. He is the author of *The Long March of Pop; Art, Music, and Design 1930 to 1995* (2015), *The Rise of the Sixties* (2005), along with other books on modern art, French painting of the eighteenth century, and approaches to art history. He is a contributing editor at *Artforum* and held a Guggenheim Fellowship for 2014-15. His 2015 Mellon lectures at the National Gallery of Art, Washington DC, explored the changes in European art after the fall of Napoleon; while his Paul Mellon Lectures at Yale and the National Gallery, London, examined Pop art, style, and music in 1960s London.

CV

Education

University of California, Los Angeles: Ph.D. (1978); M.A. (1975)
Pomona College, B.A. (1969)

Positions (selected)

Institute of Fine Arts, New York University, Rosalie Solow Professor of Modern Art
Associate Provost for the Arts, NYU, 2007 to 2011
Getty Research Institute, Director, 2000-2007
Yale University: Robert Lehman Professor of History of Art, 1996-2000; Chair,
Department of Art History, 1997-2000
University of Sussex, Professor and Chair, History of Art, 1990-1996

Honors and Awards (selected)

Paul Mellon Lecturer in British Art, National Gallery, London and Yale Center for
British Art 2017
Honorary Doctorate, University of London, 2016
A. W. Mellon Lecturer in the Fine Arts, National Gallery of Art, 2015
J.S. Guggenheim Fellow 2014-15
Holly Fellow, Clark Art Institute, 2014
Honorary Doctorate, Pomona College, 2006
Clifford Lecturer, American Society for Eighteenth-Century Studies, 2001
National Endowment for the Humanities Fellowship, 1988-1989
Charles Rufus Morey Prize, College Art Association, 1987, *Painters and Public Life in
Eighteenth-Century Paris*
Member, American Academy of Arts and Sciences since 2001

Other Professional Experience

Contributing Editor, *Artforum*

Books

2018: *Restoration: The Fall of Napoleon in the Course of European Art* (Princeton
University Press, forthcoming October)

- 2017: *No Idols: The Missing Theology of Art* (University of Sydney and University of Washington Presses)
- 2015: *The Long March of Pop: Art, Design, and Music 1930-1995* (Yale University, Press)
- 2006: *Emulation: David, Drouais, and Girodet in the Art of Revolutionary France* (Yale University Press)
- 2003: *Gordon Matta-Clark*, co-author (London: Phaidon Press)
- 1999: *The Intelligence of Art* (University of North Carolina Press).
- 1996 *The Rise of the Sixties: American and European Art in the Era of Dissent* (New York: Prentice-Hall)
- 1996: *Modern Art in the Common Culture* (Yale University Press)
- 1985: *Painters and Public Life in Eighteenth-Century Paris* (Yale University Press)

Articles and essays (previous ten years)

- “The Picture of Allen Ruppersberg as a Young Man,” in Siri Engberg ed., *Allen Ruppersberg: Intellectual Property 1968-2018* (Minneapolis: Walker Art Center, 2018)
- “Art by the Many: London Style Cults of the 1960s” *British Art Studies* (October 2017)
- “Frank Stella at the Whitney, *Artforum* (Feb. 2016), 224-225.
- “Phases and Stages in the Career of Jeff Koons,” in Jack Bankowsky ed., *Sculpture after Sculpture* (Stockholm: Moderna Museet, 2015)
- “Pop Art and Buried Allegories in the Early Works of Richard Hamilton, Claes Oldenburg and Andy Warhol,” in Paloma Alarco ed., *Pop Art Myths* (Madrid: Museo Thyssen-Bornemisza, 2014), 66-77.
- “American Idol: on Jeff Koons,” *Artforum* (Sept. 2014), 310-315.
- “Lichtenstein avant Lichtenstein,” *Les Cahiers du Musée national d’art moderne* (Spring 2014), 3-15.
- “Head Trip: ‘When Attitudes Become Form.’ Bern 1969/Venice 2013,” *Artforum* (Sept. 2013), 320-325.
- “Endless Summer: on Philip Leider’s ‘How I Spent My Summer Vacation,’ *Artforum* (September 2012), 92-103.
- “Portraits of a Pope in Captivity and Restoration: J.L. David, J.A.D. Ingres, and Thomas Lawrence,” in *La Era romántica* (Madrid: Galaxia Gutenberg and Círculo des Lectores, 2012).
- “In the Glass Menagerie: Damien Hirst with Francis Bacon,” in Ann Gallagher ed., *Damien Hirst: A Retrospective* (London: Tate Gallery, 2012), 91-102.
- “Equivalents and Equivalence in the Career of Sherrie Levine,” in Johanna Burton ed., *Sherrie Levine: Mayhem* (New York: Whitney Museum of American Art, 2011), 182-186.
- “Figures of Emergence in the Recent Sculpture of John Chamberlain,” in *John Chamberlain: New Sculpture* (New York and Milan: Rizzoli, 2011).
- “The Pop Wars” in Jennifer Farrell ed., *Get There First: Decide Promptly: The Richard Brown Baker Collection of Post-War Art*, (New Haven and London: Yale University Press, 2011), 81-98.
- “The Insistence of the Letter in the Art of Robert Indiana,” in Allison Unruh ed., *Robert Indiana: New Perspectives* (Ostfildern: Hatje Cantz, 2011), 43-99.

- “The Art of the Fugitive in 1970s Los Angeles: Runaway Self-Consciousness,” in Paul Schimmel and Lisa Gabrielle Mark eds., *Under the Big Black Sun: California Art 1974-1981* (New York and London: Prestel, 2011), 44-62.
- “Vanishing Act: Art in and Out of Pomona,” in Rebecca McGrew and Glenn Phillips eds., *It Happened at Pomona; Art at the Edge of Los Angeles 1969-1973* (Claremont: Pomona College Museum of Art, 2011), 35-53.
- “Andy Warhol among the Art Directors,” in Sarah Urist Green and Allison Unruh eds., *Andy Warhol Enterprises* (Ostfildern: Hatje Cantz, 2010), 99-114.
- “For and against the Funnies: Roy Lichtenstein’s Drawings in the Inception of Pop Art, 1961–1962,” in Isabelle Dervaux, ed., *Roy Lichtenstein: The Black-and-White Drawings, 1961–1968* (New York: Morgan Library and Museum, 2010), 29-42.
- “Call to Order: on Claude Lévi-Strauss,” *Artforum* (April 2010), 170-171.
- “Village Green Preservation Society: Damien Hirst Seen from America,” in Marie Laurberg, ed., *Damien Hirst* (Copenhagen: Arken Museum of Contemporary Art, 2009), 53-66.
- “Equivalents and Equivalence in the Career of Sherrie Levine,” in Johanna Burton ed., *Sherrie Levine: Mayhem* (New York: Whitney Museum of American Art, 2011), 182-186.
- “Figures of Emergence in the Recent Sculpture of John Chamberlain,” in *John Chamberlain: New Sculpture* (New York and Milan: Rizzoli, 2011).
- “The Pop Wars” in Jennifer Farrell ed., *Get There First: Decide Promptly: The Richard Brown Baker Collection of Post-War Art*, (New Haven and London: Yale University Press, 2011), 81-98.
- “The Insistence of the Letter in the Art of Robert Indiana,” in Allison Unruh ed., *Robert Indiana: New Perspectives* (Ostfildern: Hatje Cantz, 2011), 43-99.
- “The Art of the Fugitive in 1970s Los Angeles: Runaway Self-Consciousness,” in Paul Schimmel and Lisa Gabrielle Mark eds., *Under the Big Black Sun: California Art 1974-1981* (New York and London: Prestel, 2011), 44-62.
- “Vanishing Act: Art in and Out of Pomona,” in Rebecca McGrew and Glenn Phillips eds., *It Happened at Pomona; Art at the Edge of Los Angeles 1969-1973* (Claremont: Pomona College Museum of Art, 2011), 35-53.
- “Andy Warhol among the Art Directors,” in Sarah Urist Green and Allison Unruh eds., *Andy Warhol Enterprises* (Ostfildern: Hatje Cantz, 2010), 99-114.
- “For and against the Funnies: Roy Lichtenstein’s Drawings in the Inception of Pop Art, 1961–1962,” in Isabelle Dervaux, ed., *Roy Lichtenstein: The Black-and-White Drawings, 1961–1968* (New York: Morgan Library and Museum, 2010), 29-42.
- “Call to Order: on Claude Lévi-Strauss,” *Artforum* (April 2010), 170-171.
- “Village Green Preservation Society: Damien Hirst Seen from America,” in Marie Laurberg, ed., *Damien Hirst* (Copenhagen: Arken Museum of Contemporary Art, 2009), 53-66.
- “The Absconded Subject of Pop,” *Res* 55/56 (2009), 5-20.
- “Acting the Part: Venice 2009,” *Artforum* (Sept. 2009), 225-230.
- “Open Conversation: on Charles Harrison (1942-2009),” *Artforum* (November 2009).
- “Photography as a Sculptural Medium in the Work of Gordon Matta-Clark” in Helen Westgeest and Kitty Zijlmans eds., *Take PLACE: Photography in Multi-Media Works of Art and the Concept of Place* (London: Equinox, 2009).

- “Folk into Art: A Phenomenon of Class and Culture in Twentieth-Century America,” in Robert Cantwell, Andrew Perchuk, and Rani Singh eds., *Harry Smith: The Avant-Garde in the American Vernacular* (Los Angeles: Getty Research Institute, 2009), 205-224.
- “Lives of Allegory: Bob Dylan and Andy Warhol” in Colleen Sheehy and Thom Swiss eds., *Highway 61 Revisited: Dylan’s Road from Minnesota to the World*, (Minneapolis and London: University of Minnesota Press, 2009), 63-77.
- “Composition and Decomposition in Girodet’s *Revolt of Cairo*,” in William Tronzo ed., *The Fragment: An Incomplete History* (Los Angeles: Getty Research Institute, 2009), 175-192.

EXHIBIT B
List of Materials Reviewed and Relied Upon

- Andy Warhol, *Prince*, 1984, acrylic and silkscreen ink on linen, 20 x 16 inches
 Andy Warhol, *Prince*, 1984, acrylic and silkscreen ink on linen, 20 x 16 inches
 Andy Warhol, *Prince*, 1984, acrylic and silkscreen ink on linen, 20 x 16 inches
 Andy Warhol, *Prince*, 1984, acrylic and silkscreen ink on linen, 20 x 16 inches
 1962 Michael Fried, "New York Letter," review of Andy Warhol at the Stable Gallery, *Art International* (December), 57
 1970 John Coplans, *Andy Warhol* (New York Graphic Society)
 1970 Rainer Crone, *Andy Warhol: A Catalogue Raisonné* (New York: Praeger)
 1979 Robert Rosenblum "Andy Warhol: Court Painter to the 70s," in David Whitney ed., *Andy Warhol: Portraits of the Seventies* (New York: Random House) 205-216
 1984 "Tristan Vox" [Leon Weiseltier], "Purple Fame: An Appreciation of Prince at the Height of His Powers, *Vanity Fair* (November), 66
 1987 Thomas Crow, "Saturday Disasters: Trace and Reference in Early Andy Warhol," originally published in *Art in America* (May), 129-136
 1988 Patrick S. Smith, *Warhol: Conversations about the Artist* (UMI Research Press)
 1989 Victor Bockris, *The Life and Death of Andy Warhol* (New York: Bantam)
 1989 Kynaston McShine ed., *Andy Warhol: A Retrospective* (New York: Museum of Modern Art)
 1989 Benjamin H.D. Buchloh, "Andy Warhol's One-Dimensional Art," in McShine ed., *Andy Warhol: A Retrospective*
 1989 Marco Livingstone, "Do It Yourself: Notes on Warhol's Technique." in McShine ed., *Andy Warhol: A Retrospective*
 1989 Michael Brenson, "Review/Art: Looking Back at Warhol, Stars, Super-Heroes and All." *New York Times* (3 February)
 1990 Bob Colacello, *Holy Terror: Andy Warhol Close Up* (New York: Harper Collins)
 1992 Serge Guilbaut ed., *Reconstructing Modernism: Art in New York, Paris, and Montreal 1945-1964* (Cambridge MA and London: MIT Press)
 1992 Charles Stuckey, *Andy Warhol: Heaven and Hell Are Just One Breath Way! Late Paintings and Related Works* (New York: Rizzoli and Gagosian Gallery)
 1996 Thomas Crow, *Modern Art in the Common Culture* (New Haven and London: Yale University Press)
 2001 Annette Michelson ed., *October Files 2: Andy Warhol* (Cambridge MA and London: MIT Press, 2001), 49-68
 2002 Heiner Bastian, "Introduction," *Andy Warhol Retrospective* (Los Angeles: Museum of Contemporary Art), 27-28
 2003 Steven Watson, *Factory Made: Warhol and the Sixties* (New York: Random House)
 2010 Warren Perry, "Michael Jackson and Andy Warhol: Destined to Meet," National Portrait Gallery blog (9 October), <http://npg.si.edu/blog/michael-jackson-and-andy-warhol-destined-meet>
 2014 Thomas Crow, *The Long March of Pop: Art, Music, and Design 1930-1995* (Yale University Press)
 2016 Gilda Williams ed., *On&By Andy Warhol* (London and Cambridge, MA: Whitechapel Galley and MIT Press, 2016)

Transcript of Deposition of Lynn Goldsmith (Jan. 18, 2018)
Transcript of Deposition of Michael Hermann (Jan. 25, 2018)
Transcript of Deposition of Adrienne Fields (Feb. 6, 2018)
Transcript of Deposition of Neil Printz (Feb. 8, 2018)
Transcript of Deposition of KC Maurer (Feb. 8, 2018)
Transcript of Deposition of Gerard Malanga (Feb. 16, 2018)
Transcript of Deposition of Myra Kreiman (Feb. 23, 2018)
Transcript of Deposition of Chris Donnellan (Mar. 25, 2018)
Transcript of Deposition of Esin Goknar (Mar. 27, 2018)
Amended Answer and Counterclaim, *Andy Warhol Foundation v. Lynn Goldsmith, et al.*, 17 Civ. 2532 (S.D.N.Y.) (Warhol Exhibit 1.)
Biography and *curriculum vitae* of Lynn Goldsmith (Warhol Exhibit 2.)
Rock and Roll Stories by Lynn Goldsmith: “A wop bop a loo bop a lop bam boom” (Warhol Exhibit 3.)
Lynn Goldsmith “In the Looking Glass” Photo (Warhol Exhibit 4.)
Lynn Goldsmith: In The Looking Glass (Warhol Exhibit 5.)
Lynn Goldsmith Photograph of Bruce Springsteen (Warhol Exhibit 6.)
Goldsmith Photograph of Marianne Faithfull (Warhol Exhibit 7.)
Goldsmith Photograph of Telephone (Warhol Exhibit 8.)
Invitation from Frank Pictures (Warhol Exhibit 9.)
PhotoDiary by Lynn Goldsmith: About the Book (Warhol Exhibit 10.)
PhotoDiary by Lynn Goldsmith (Warhol Exhibit 11.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 12.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 13.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 14.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 15.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 16.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 17.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 18.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 19.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 20.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 21.)
Lynn Goldsmith Photograph of Prince (Warhol Exhibit 22.)
Lynn Goldsmith Invoice to Newsweek (Warhol Exhibit 23.)
Lynn Goldsmith Prince Photo Approval form to Vanity Fair (Warhol Exhibit 24.)
Email from Lynn Goldsmith to Warhol Foundation (Warhol Exhibit 25.)
Lynn Goldsmith Facebook Post (Apr. 9, 2017) (Warhol Exhibit 26.)
Image of Andy Warhol *Prince* (Warhol Exhibit 27.)
Image of Andy Warhol *Prince* (Warhol Exhibit 28.)
Email from Lynn Goldsmith to Warhol Foundation (July 28, 2016) (Warhol Exhibit 29.)
Image of Andy Warhol *Prince* (Warhol Exhibit 30.)
Image of Andy Warhol *Prince* (Warhol Exhibit 31.)
Image of Andy Warhol *Prince* (Warhol Exhibit 32.)
Image of Andy Warhol *Prince* (Warhol Exhibit 33.)
Image of Andy Warhol *Prince* (Warhol Exhibit 34.)
Image of Andy Warhol *Prince* (Warhol Exhibit 35.)

Image of Andy Warhol *Prince* (Warhol Exhibit 36.)
Image of Andy Warhol *Prince* (Warhol Exhibit 37.)
Image of Andy Warhol *Prince* (Warhol Exhibit 38.)
Image of Andy Warhol *Prince* (Warhol Exhibit 39.)
Image of Andy Warhol *Prince* (Warhol Exhibit 40.)
Image of Andy Warhol *Prince* (Warhol Exhibit 41.)
Image of Andy Warhol *Prince* (Warhol Exhibit 42.)
2003 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 43.)
2004 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 44.)
2005 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 45.)
2006 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 46.)
2004 Lynn Goldsmith Invoice to Michael Zilkha (Warhol Exhibit 47.)
2004 Lynn Goldsmith Invoice to Michael Zilkha (Warhol Exhibit 48.)
2005 Lynn Goldsmith Invoice to Dennis Pub/Blender Mag (Warhol Exhibit 49.)
2006 Lynn Goldsmith Invoice to Russeck Fine Art Group (Warhol Exhibit 50.)
2007 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 51.)
2007 Lynn Goldsmith Invoice to People Magazine (Warhol Exhibit 52.)
2008 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 53.)
2009 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 54.)
2009 Lynn Goldsmith Invoice to Trois Couleurs MK2 Multimedia (Warhol Exhibit 55.)
2009 Lynn Goldsmith Invoice to Hard Rock Hotel (Warhol Exhibit 56.)
2010 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 57.)
2010 Lynn Goldsmith Invoice to San Francisco Art Exchange (Warhol Exhibit 58.)
2010 Lynn Goldsmith Invoice to Rittor Music Inc (Warhol Exhibit 59.)
2011 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 60.)
2011 Lynn Goldsmith Invoice to ULTRADEV (Warhol Exhibit 61.)
2012 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 62.)
2012 Lynn Goldsmith Invoice to Analogue Gallery (Warhol Exhibit 63.)
2012 Lynn Goldsmith Invoice to Jimmy Iovine (Warhol Exhibit 64.)
2013 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 65.)
2014 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 66.)
2013 Lynn Goldsmith Invoice to Smithsonian Magazine (Warhol Exhibit 67.)
2013 Lynn Goldsmith Invoice to Readers Digest (Warhol Exhibit 68.)
2014 Lynn Goldsmith Invoice to Artchives-Morrison Hotel Gallery (Warhol Exhibit 69.)
2014 Lynn Goldsmith Invoice to Mitch P Whittaker (Warhol Exhibit 70.)
2015 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 71.)
2015 Lynn Goldsmith Invoice to Artchives-Morrison Hotel Gallery (Warhol Exhibit 72.)
2015 Lynn Goldsmith Invoice to Camera Press (Warhol Exhibit 73.)
2016 Lynn Goldsmith Sales Report Breakdown (Warhol Exhibit 74.)
2016 Lynn Goldsmith Invoice to Artchives-Morrison Hotel Gallery (Warhol Exhibit 75.)
2015 Lynn Goldsmith Invoice to Artchives-Morrison Hotel Gallery (Warhol Exhibit 76.)
2016 Lynn Goldsmith Invoice to San Francisco Art Exchange (Warhol Exhibit 77.)
2016 Lynn Goldsmith Invoice to Artchives-Morrison Hotel Gallery (Warhol Exhibit 78.)
2016 Lynn Goldsmith Invoice to Russeck Fine Art Group (Warhol Exhibit 79.)
2016 Lynn Goldsmith Invoice to San Francisco Art Exchange (Warhol Exhibit 80.)
2016 Lynn Goldsmith Invoice to Brian Liss Gallery (Warhol Exhibit 81.)

2016 Lynn Goldsmith Invoice to 24 Maddox St (Warhol Exhibit 82.)
 2016 Lynn Goldsmith Invoice to People Magazine (Warhol Exhibit 83.)
 2016 Lynn Goldsmith Invoice to New Bay Media – Guitar World (Warhol Exhibit 84.)
 Morrison Hotel Gallery Website: About Us (Warhol Exhibit 85.)
 Morrison Hotel Gallery Website: Lynn Goldsmith (Warhol Exhibit 86.)
 Morrison Hotel Gallery Website Search: photographs matching ‘Prince’ (Warhol Exhibit 87.)
 Analogue Gallery Twitter Page (Warhol Exhibit 88.)
 Richard Goodall Gallery Website: About Us (Warhol Exhibit 89.)
 Blender Gallery Website: About Us (Warhol Exhibit 90.)
 Lynn Goldsmith Rock Mosaic Price List (Warhol Exhibit 91.)
 Lynn Goldsmith Price List (Warhol Exhibit 92.)
 Lynn Goldsmith Facebook Post (Apr. 17, 2017) (Warhol Exhibit 93.)
 Lynn Goldsmith GoFundMe Page (Warhol Exhibit 94.)
 Complaint Ex. B, *Andy Warhol Foundation v. Goldsmith*, 17 Civ. 2532 (S.D.N.Y.) (Warhol Exhibit 95.)
 Complaint Ex. C, *Andy Warhol Foundation v. Goldsmith*, 17 Civ. 2532 (S.D.N.Y.) (Warhol Exhibit 96.)
 Lynn Goldsmith Instagram Post (Aug. 17, 2017) (Warhol Exhibit 97.)
 Plaintiff’s Request for Production of Documents (Warhol Exhibit 98.)
 Defendants’ and Counterclaim Plaintiff’s Response & Objections to Plaintiff’s Request for Production of Documents (Warhol Exhibit 99.)
 Defendants’ and Counterclaim Plaintiff’s Response & Objections to Plaintiff’s Interrogatories (Warhol Exhibit 100.)
 Notice of Fed. R. Civ. 30(b)(6) Deposition to Defendants (Warhol Exhibit 101.)
 Interview of Gerard Malanga (Nov. 1, 1978) (Warhol Exhibit 102.)
 Gerard Malanga, *Working with Warhol*, The Village Voice (May 5, 1987) (Warhol Exhibit 103.)
 Gerard Malanga, *A Conversation with Andy Warhol*, The Print Collector’s Newsletter (Warhol Exhibit 104.)
 Jim Miller, *The Naughty Prince of Rock*, Newsweek (Dec. 21, 1981) (Warhol Exhibit 105.)
 Email from Lynn Goldsmith to Barry Werbin (Dec. 7, 2017) (Warhol Exhibit 106.)
 Invoice from Lynn Goldsmith to Vanity Fair (Oct. 29, 1984) (Warhol Exhibit 107.)
 Email from David Friend to Marianne Butler (Dec. 8, 2016) (Warhol Exhibit 108.)
 Email from David Friend to Marianne Butler (Apr. 22, 2018) (Warhol Exhibit 109.)
 Email from Hannah Rhadigan to M. Fernanda Meza (Jun. 10, 2016) (Warhol Exhibit 110.)
 Esin Ili Goknar’s LinkedIn page (Mar. 21, 2018) (Warhol Exhibit 111.)
 Complaint, *Andy Warhol Foundation v. Lynn Goldsmith*, 17 Civ. 2532 (S.D.N.Y.) (LG Exhibit 1.)
 Andy Warhol Foundation Database Records (LG Exhibit 2.)
 Email from Samo Gale to Mark Jacobson (Apr. 22, 2016) (LG Exhibit 3.)
 Email from Michael Hermann to Samo Gale (Apr. 22, 2016) (LG Exhibit 4.)
 Email from Mark Jacobson to Samo Gale (Apr. 25, 2016) (LG Exhibit 5.)
 Email from Mark Jacobson to Samo Gale (Apr. 25, 2016) (LG Exhibit 6.)
 Email from Hannah Rhadigan to Samo Gale (Apr. 25, 2016) (LG Exhibit 7.)
 Email from Hannah Rhadigan to Samo Gale (Apr. 26, 2016) (LG Exhibit 8.)
 Email from Michael Hermann to KC Maurer and Joel Wachs (Apr. 29, 2016) (LG Exhibit 9.)
 Email from Lynn Goldsmith Michael Hermann (July 28, 2016) (LG Exhibit 10.)

Email from Lynn Goldsmith to Michael Hermann (July 28, 2016) (LG Exhibit 11.)
Email from Michael Hermann to Lynn Goldsmith (July 29, 2016) (LG Exhibit 12.)
Email from Michael Hermann to Lynn Goldsmith (Aug. 3, 2016) (LG Exhibit 13.)
Email from Michael Hermann to Lynn Goldsmith (Oct. 11 2016) (LG Exhibit 14.)
Email from Lynn Goldsmith to Michael Hermann (Aug. 3, 2016) (LG Exhibit 15.)
Letter to Michael Hermann from Artists Rights Society (July 30, 2009) (LG Exhibit 16.)
Letter to Michael Hermann from Artists Rights Society (July 17, 2013) (LG Exhibit 17.)
Letter to Michael Hermann from Artists Rights Society (July 25, 2016) (LG Exhibit 18.)
License Agreement between Warhol Foundation and King and McGaw Limited (Apr. 27, 2010) (LG Exhibit 19.)
Email from Samo Gale to Licensing (May 19, 2016) (LG Exhibit 20.)
Email from Samo Gale to Licensing (May 21, 2016) (LG Exhibit 21.)
Email from Samo Gale to Giancarlo Lisic (May 18, 2016) (LG Exhibit 22.)
Email from Michael Hermann to Anna Shawcross, Rebecca Adams, and Deanna Caceres Cahn (June 28, 2005) (LG Exhibit 23.)
WorldArtsCulture Etsy Website (LG Exhibit 24.)
Badge Geeks Etsy Website (LG Exhibit 25.)
Atomicrorkcetpoplab Etsy Website (LG Exhibit 26.)
Email from ARS to B. Werbin (Jan. 9, 2018) (LG Exhibit 27.)
Subpoena to Artists Rights Society, *Andy Warhol Foundation v. Lynn Goldsmith*, 17 Civ. 2532 (S.D.N.Y.) (Dec. 20, 2017) (LG Exhibit 28.)
Representation Agreement between The Andy Warhol Foundation and Artists Rights Society (Jan. 1, 2016) (LG Exhibit 29.)
First Amendment to License Agreement and Third Renewal Agreement between The Andy Warhol Foundation and Artists Rights Society (Mar. 10, 2016) (LG Exhibit 30.)
Warhol 'Prince' Report (Jan. 4, 2018) (LG Exhibit 31.)
Artists Right Society Payment from 4/1/2013-6/30/2013 (June 30, 2013) (LG Exhibit 32.)
Artists Right Society Payment from 4/1/2016-6/30/2016 (June 30, 2016) (LG Exhibit 33.)
ARS Payments 1999-2017 (March 31, 2017) (LG Exhibit 34.)
Licensing Agreement including Amendments (Jan. 1, 1989) (LG Exhibit 35.)
Invoice RE Wonderland Press (Sept. 13, 1989) (LG Exhibit 36.)
License between ARS and Wonderland Press (Aug. 20, 1999) (LG Exhibit 37.)
Invoice from Artists Rights Society RE Warhol Monograph/Goliga Books (Dec. 4, 2000) (LG Exhibit 38.)
Invoice from Artists Rights Society RE Warhol Monograph/Goliga Books (Dec. 4, 2000) (LG Exhibit 39.)
Invoice RE Frist Center (Feb. 14, 2013) (LG Exhibit 40.)
Invoice RE Prestel (March 6, 2014) (LG Exhibit 41.)
Email from Samo Gale to Janet Hicks (April 8, 2014) (LG Exhibit 42.)
Paul Maréchal, *Andy Warhol: The Complete Commissioned Magazine Work*, Prestel (excerpts) (LG Exhibit 43.)
Invoice from Artists Rights Society (Apr. 22, 2014) (LG Exhibit 44.)
Invoice from Artists Rights Society (Apr. 3, 2013) (LG Exhibit 45.)
Email from Maria Fernanda Meza to Dana Kravis (Mar. 26, 2013) (LG Exhibit 46.)
Invoice from Artists Rights Society (May 13, 2013) (LG Exhibit 47.)
Email chain from Janet Hicks (Feb. 14, 2013) (LG Exhibit 48.)

Invoice RE Phoenix Art Museum (Dec. 29, 2014) (LG Exhibit 49.)
 Invoice RE Phoenix Art Museum (Apr. 13, 2015) (LG Exhibit 50.)
 Email Chain from Carlotta Soares to Janet Hicks RE TV Spot for Warhol Exhibition (Mar. 3, 2015) (LG Exhibit 51.)
 Invoice from Artists Rights Society (June 15, 2016) (LG Exhibit 52.)
 Invoice from Artists Rights Society (Apr. 25, 2016) (LG Exhibit 53.)
The Genius of Prince, Conde Nast Special Editions (Aug. 15, 2016) (Cover page only) (LG Exhibit 54.)
 Email Chain from Janet Hicks to Adrienne Fields (Dec. 20, 2017) (LG Exhibit 55.)
 Email from Samo Gale to Hannah Rhadigan (Apr. 29, 2017) (LG Exhibit 56.)
 Email from Mark Jacobson to Hannah Rhadigan (Apr. 28, 2016) (LG Exhibit 57.)
 Email from Hannah Rhadigan to Mark Jacobson (Apr. 25, 2016) (LG Exhibit 58.)
 Email from Hannah Rhadigan to Mark Jacobson (Apr. 29, 2016) (LG Exhibit 59.)
 Invoice RE Galeria Starmach (LG Exhibit 60.)
 “Tristan Vox” [Leon Weiseltier], “Purple Fame: An Appreciation of Prince at the Height of His Powers,” *Vanity Fair* (November 1984) (LG Exhibit 61.)
 Database Records: Prince 13 Paintings 2 Drawings (LG Exhibit 62.)
 Database Records: PO 50.537 (LG Exhibit 63.)
 Database Records : Reg. 4411 (LG Exhibit 64.)
 Database Records: Reg. 7060 (LG Exhibit 65.)
 @ambiancegroup, Instagram Post (May 25, 2016) (LG Exhibit 66.)
 Database Records: Reg. 7803 (LG Exhibit 67.)
 Database Records: Reg. 8700 (LG Exhibit 68.)
 Database Records: Reg. 9460 (LG Exhibit 69.)
 Database Records: Reg. 19894 (LG Exhibit 70.)
 Database Records: Reg. 19895 (LG Exhibit 71.)
 Database Records: Reg. 21798 (LG Exhibit 72.)
 Database Records: Reg. 21799 (LG Exhibit 73.)
 Database Records: Reg. 21800 (LG Exhibit 74.)
The Genius of Prince, Conde Nast Special Editions (Aug. 15, 2016) (LG Exhibit 75.)
 Database Records: Reg. 21801 (LG Exhibit 76.)
 Database Records: Reg. 21802 (LG Exhibit 77.)
 Database Records: Reg. 21803 (LG Exhibit 78.)
 Database Records: Reg. 21804 (LG Exhibit 79.)
 Database Records: Drawings (LG Exhibit 80.)
 Database Records: Reg. 13664 (LG Exhibit 81.)
 Database Records: Reg. 13665 (LG Exhibit 82.)
 Letter from C. Defendi (June 22, 1995) (LG Exhibit 83.)
 Minutes of Meeting of Board of Directors of the Andy Warhol Art Authentication Board, Inc. (Oct. 7, 2002) (LG Exhibit 84.)
 Andy Warhol Authentication Board Records (Oct. 15, 2002) (LG Exhibit 85.)
 Andy Warhol Authentication Board Records (Oct. 5, 2002) (LG Exhibit 86.)
 Andy Warhol Authentication Board Records (LG Exhibit 87.)
 Records containing, among other things, *Purple Fame*, *Vanity Fair* (LG Exhibit 88.)
 Photograph of Gallery with Andy Warhol Prince Painting (LG Exhibit 89.)
 Artnet.com (Feb. 7, 2018) (LG Exhibit 90.)

Vanity Fair (Nov. 1984) (LG Exhibit 91.)
 Inventory of Time Capsule 84 (LG Exhibit 92.)
 Database record (LG Exhibit 93.)
 Database records (LG Exhibit 94.)
 Frayda Feldman and Claudia Defendi, *Warhol Prints, A Catalogue Raisonne, 1962-1987* (4th ed. 2003) (excerpts). (LG Exhibit 95.)
 Letter to Vanity Fair from the Andy Warhol Foundation (June 17, 1996) (LG Exhibit 96.)
 Letter from Conde Nast to Warhol Foundation (June 21, 1996)(LG Exhibit 97.)
 Transfer inventory: Paintings, Sculpture & Collaborations (Feb 1, 1991) (LG Exhibit 98.)
 Transfer inventory: Original Works on Paper (May 1, 1991) (LG Exhibit 99.)
 Transfer inventory: Unpublished/unique prints (May 1, 1991) (LG Exhibit 100.)
 Database records (LG Exhibit 101.)
 Andy Warhol Foundation Final Museum Reference list (May 16, 1994) (LG Exhibit 102.)
 Andy Warhol Foundation Reference list (May 16, 1994) (LG Exhibit 103.)
 Inventory of Warhol Prince paintings (Jan 22, 2018) (LG Exhibit 104.)
 Andy Warhol Invoice of Prince paintings to Anthony d'Offay Gallery (Oct 28, 1993) (LG Exhibit 105.)
 Andy Warhol Invoice of Prince paintings to Ronald Feldman Fine Arts (Mar 30, 1998) (LG Exhibit 106.)
 Andy Warhol Invoice of Prince paintings to Bjorn Wetterling Gallery (Feb 8, 2000) (LG Exhibit 107.)
 Andy Warhol Invoice of Prince paintings to Ronald Feldman Fine Arts (July 12, 2001) (LG Exhibit 108.)
 Andy Warhol Invoice of Prince paintings to Jablonka Galerie (Feb 20, 2002) (LG Exhibit 109.)
 Letter from Andy Warhol Foundations to Jablonka Galerie (Feb. 19, 2002) (LG Exhibit 110.)
 Andy Warhol Invoice of Prince paintings to J. Kern Fine Arts (Jan 9, 2003) (LG Exhibit 111.)
 Andy Warhol Invoice of Prince paintings to Coskun & Co.Ltd. (Oct 7, 2003) (LG Exhibit 112.)
 Andy Warhol Invoice of Prince paintings to Stellan Holm Gallery, Inc. (Oct. 12, 2004) (LG Exhibit 113.)
 Warhol Prints (2018). Revolver Gallery.com. (Feb. 15, 2018) (LG Exhibit 114.)
 Rusty Adam Meadows, *Appropriating from the World of Business: Andy Warhol's Key to Success*, Undergraduate Honors Theses (LG Exhibit 115.)
 Email from Matt Barad to Omotomi Omololu-Lange (Apr. 22, 2016) (LG Exhibit 116.)
 Email from Leah McLaughlin to Mark Jacobson et al. (Apr. 21, 2016) (LG Exhibit 117.)
 Email from Marianne Butler to Mark Jacobson (Apr. 21, 2016) (LG Exhibit 118.)
 Email from Greg Ferro to Leah Mclaughlin (Apr. 22, 2016) (LG Exhibit 119.)
 Email from Greg Ferro to Leah Mclaughlin (Apr. 25, 2016) (LG Exhibit 120.)
 Email from Greg Ferro to David Friend (Apr. 26, 2016) (LG Exhibit 121.)
 Email from Marianne Butler to David Friend (Apr. 23, 2016) (LG Exhibit 122.)
 Email from Mark Jacobson to Leah Mclaughlin, et al. (Apr. 22, 2016) (LG Exhibit 123.)
 3 images of Andy Warhol *Prince* portraits (LG Exhibit 124.)
 "Tristan Vox" [Leon Weiseltier], "Purple Fame: An Appreciation of Prince at the Height of His Powers, *Vanity Fair* (November 1984) (LG Exhibit 125.)
 Vanity Fair Special Report: Goodbye to an Enigmatic Genius. (2018). *Vanity Fair*. (Mar. 13, 2018) (LG Exhibit 126.)
 Email from Greg Ferro to Marianne Butler, et al. (Apr. 29, 2016) (LG Exhibit 127.)

Facebook: Vanity Fair (April 22, 2016) (LG Exhibit 128.)

“Tristan Vox” [Leon Weiseltier], “Purple Fame: An Appreciation of Prince at the Height of His Powers, *Vanity Fair* (November 1984) (LG Exhibit 129.)

“Tristan Vox” [Leon Weiseltier], “Purple Fame: An Appreciation of Prince at the Height of His Powers, *Vanity Fair* (November 1984) (LG Exhibit 130.)

“Tristan Vox” [Leon Weiseltier], “Purple Fame: An Appreciation of Prince at the Height of His Powers, *Vanity Fair* (November 1984) (LG Exhibit 131.)